

**Bruce L. Campbell**  
**OSB No. 925377**  
bruce.campbell@millernash.com  
**Madeline Engel**  
**OSB No. 096283**  
madeline.engel@millernash.com  
MILLER NASH LLP  
3400 U.S. Bancorp Tower  
111 S.W. Fifth Avenue  
Portland, Oregon 97204-3699  
Telephone: (503) 224-5858  
Facsimile: (503) 224-0155

Attorneys for Defendant Portland Public Schools

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
Portland Division

**AHM**, by and through her Guardian *ad litem* and father David Mark Morrison, and  
**David Mark Morrison**, individually,

Plaintiffs,

v.

CV No. 3:11-CV-00739-MO

PORLAND PUBLIC SCHOOLS'  
MOTION FOR SUMMARY  
JUDGMENT

**ORAL ARGUMENT REQUESTED**

**Portland Public Schools,**

Defendant.

**LR 7.1 CERTIFICATION**

Counsel for defendant Portland Public Schools conferred with counsel for plaintiffs AHM and David Mark Morrison, but the parties have been unable to do resolve the dispute.

Page 1 - Portland Public Schools' Motion for Summary Judgment

## INTRODUCTION

Pursuant to Fed. R. Civ. P. 56, defendant Portland Public Schools ("PPS") moves the court for summary judgment against plaintiffs AHM and David Mark Morrison. PPS's motion is based on the accompanying Portland Public Schools' Memorandum in Support of Motion for Summary Judgment, the Declaration of Bruce Campbell in Support of Portland Public Schools' Motions to Exclude or Strike Plaintiffs' Expert Reports and for Summary Judgment, and the exhibits filed therein.

DATED this 6th day of April, 2012.

MILLER NASH LLP

s/ Bruce L. Campbell

Bruce L. Campbell, OSB No. 925377  
bruce.campbell@millernash.com  
Madeline Engel, OSB No. 096283  
madeline.engel@millernash.com  
Fax: (503) 224-0155

Attorneys for Defendant  
Portland Public Schools

I hereby certify that I served the foregoing Portland Public Schools' Motion for Summary Judgment on:

Mr. Shawn E. Abrell  
Attorney at Law  
3405 N.W. 31<sup>st</sup> Circle  
Camas, Washington 98607  
E-mail: shawn.e.abrell@gmail.com

Attorney for Plaintiffs

Mr. Tyl W. Bakker  
Tyl W. Bakker LLC  
621 S.W. Alder Street, Suite 621  
Portland, Oregon 97205  
E-mail: tylbakker@gmail.com

Attorney for Plaintiffs

by the following indicated method or methods:

- CM/ECF system transmission.**
- E-mail.** As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or Wordperfect format, not in pdf, unless otherwise agreed to by the parties.
- Facsimile communication device.**
- First-class mail, postage prepaid.**
- Hand-delivery.**
- Overnight courier, delivery prepaid.**

DATED this 6th day of April, 2012.

s/ Bruce L. Campbell  
Bruce L. Campbell, P.C., OSB No. 925377

Of Attorneys for Portland Public Schools